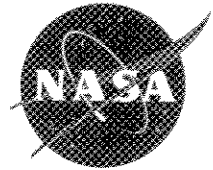


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



November 30, 2011

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the
Arianespace Holiday Reception on December 7, 2011

On December 7, 2011, Arianespace will host its Holiday Reception at the Homer Building in Washington, D.C. from 7 PM – 10 PM. This is an annual holiday reception and buffet.

The event will be attended by NASA personnel, Department of State, Defense and Commerce and Transportation, Members of Congress and its staff, White House officials the aerospace industry, non-profits and members of the public. Over 400 people are expected to attend. The estimated cost of the refreshments, which includes all food and beverages, is \$40.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at this event will allow NASA representatives to discuss NASA's programs and plans with the other attendees. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the refreshments they and their accompanying guests consume.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a large, sweeping "A" and "G".

Adam F. Greenstone